4101 S. Bannock Street
Englewood, CO 80110

September 16, 2013

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Modernizing the E-rate	)	**WC Docket No. 13-184**
Program for Schools and Libraries	)	

Comment for Proposed Rulemaking
Colorado Association of Leaders in Educational Technology

Dear Members of the Federal Communications Commission:

The Colorado Association of Leaders in Educational Technology (CALET)submits the following comments on behalf of school district technology leaders from the state of Colorado. CALET is a not for profit membership association of technology leaders in school districts from across the state of Colorado.

CALET's comments are based upon discussions and written commentary from school districts across Colorado. These leaders represent high and low NSLP school districts, high and low student population school districts, and school districts located in rural, suburban and urban areas.

Our responses to the FCC E-Rate 2.0 NPRM 13-184, released on July 19th 2013, follow:

17. CALET agrees with the goal of affordable to 21st century broadband. However, we also believe that affordable access also includes technologies required to connect the endpoint device to broadband. This includes wireless and wired LAN technologies, WAN technologies and other technologies such as filtering to meet regulatory statute requirements.

20-27. CALET fully supports benchmarking as a means for districts to compare wireless and wired network and internet capabilities. We also fully support adopting a standard, such as SETDA, as a target for internet, wireless and wired network capacity and throughput, but we also recommend that these

standards are reviewed independently every 3 years to ensure the standard continues to meet the needs of digital learning. We support setting a minimum standard as a target for all school districts. There may be areas where the cost to reach these targets may be higher, but we believe the purpose of E-Rate and other Federal programs is to enable these remote areas to receive the same level of access as those areas where market forces make access available and affordable. We support an underlying purpose of E-Rate is to ensure each student has the same level of access to enable an equitable learning experience.

28. As classrooms make more use of technology, latency, jitter and other service quality factors demand not just a high speed connection, but a quality connection too. Network latency is a key factor in video, such as needed with distance or online learning. CALET is very supportive of quality transmission standards, but caution that these same standards need to apply to service providers as a quality connection is only as good as the weakest link in the chain.

31-39. CALET supports publicly available information which enables school district peer comparison and allows service providers to understand how they need to improve services and costs to remain selected providers. While most of the technologies to support internet, wireless and wired network do provide some level of monitoring tools, the metrics provided are often rudimentary. CALET recommends the metrics collected for E-Rate benchmarking are generic and simple to ensure the data is collected and avoid the need to purchase complex monitoring tools and staff to administer and report.

40. CALET agrees that the FCC should remain true to its core competency and use measures related to the eligible services list and not educational measures to determine effectiveness. The explosion of technology in the classroom is not limited to instructional outcomes, but also online assessment and operational needs of school districts.

71-80. CALET supports treating lit and dark fiber equally, whether leased or owned. This support includes the modulating electronics as well as network managed services. CALET supports funding both recurring costs and initial deployment costs. We also support the continued practice of spreading capital deployment costs over 3 years and enabling districts to receive funding for building their own WAN networks by removing section 54.518, the prohibition against funding self-built WAN infrastructure.

83. CALET agrees that priority two funding for internal connections is not effective and supports the elimination of the 2 in 5 rule and replacement by a more equitable formula. School districts not only need E-Rate support for the broadband service, but also for the technology layers enabling connection from the endpoint device to the broadband service. These technologies include wireless access points, routers, switches, WANs and filtering technologies. CALET supports migrating these types of technologies to priority one funding and deprioritizing other priority one services which are not directly supporting the E-Rate goal of affordable broadband.

90-100. CALET also supports shifting the E-Rate focus toward technologies which provide services to the core purpose of educating student and less on services that are used only by administrators, staff and school boards. We would support a phase down of any services being removed from the eligible services list to enable school districts to plan accordingly and minimize hardship to those districts. We agree that technology has evolved and outdated services should be removed.

58, 173-174: CALET supports permanently raising the E-Rate fund to $5 billion to support the additional services, such as internal connections, necessary to support 21st Century digital learning. CALET also recommends the E-Rate fund be tied to an index to ensure sustainable funding as technology needs continue to grow.

179-185. CALET fully supports consortia as a way to leverage buying power and establish favorable pricing. CALET believes the decision to join a consortia is a district by district decision. Consortia pricing can be favorable, but can also limit partners and technologies. CALET does not support favoring consortia applications over district applications simply because it may not be the most cost effective for a particular district.

210. CALET supports eliminating the Form 500 process altogether to streamline processing. Form 271 should provide the information for funding and it requires services to have a contract in place.

214. CALET supports direct disbursement of reimbursement funds to the applicant and eliminating the service provider in the BEAR process.

270-275. CALET supports technology measures (filtering) for computing devices which are accessing the internet using the school district network. CALET supports CIPA requirements for technology devices which a district owns, provided those devices are accessing the internet through the school district network. CALET favors limiting the CIPA requirement to district owned networks and devices. CALET requests that technology measures be added to the eligible services due to the CIPA requirement to receive E-Rate funding.

Off campus. CALET requests that the FCC review the successful results of the LOGO pilot program and reinstate funding for connections used off campus to facilitate learning beyond the traditional school day. CALET recommends funding for home connectivity options for underserved students.

The E-Rate program has been instrumental in Colorado in bringing internet access to every school and in many cases to every classroom. CALET believes a revitalized E-Rate program will significantly strengthen our public schools and enable learning opportunities to improve our student's success.

Respectfully Submitted on behalf of the CALET Board,

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